

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 19960324

REGION VIII

999 18th STREET - SUITE 500 DENVER, COLORADO 80202-2466

SEP 1 3 1996

Ref: 8EPR-EP

Mr. Burt Kulesza Forest Supervisor Ashley National Forest 355 N. Vernal Ave. Vernal, UT 84078

> Re: Draft Environmental Impact Statement for Management of the High Unitas Wilderness

Dear Mr. Kulesza:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Region VIII Office of the Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the subject project. We offer the following comments for your consideration.

We commend the Ashley and Wasatch-Cache National Forests for their mutual concerns of the condition and use of the High Uintas Wilderness and the need to amend current direction in the existing Forest Plans. The EPA agrees that evaluating existing monitoring results and the application of the Limits of Acceptable Change (LAC) planning process will aid the Forests in defining those desired conditions to be maintained or restored in the wilderness.

The EPA believes that selection and implementation of Alternative 1, the Forests preferred alternative, as the proposed action meets the stated purpose and need.

Based on the procedures the EPA uses to evaluate the environmental impacts of the proposed action and alternatives and the adequacy of information provided, the EPA Region VIII rates the draft EIS as category LO (Lack of Objections). A summary of the EPA's rating definitions is attached for reference.

The EPA appreciates the opportunity to review and comment on the draft EIS. If you have any questions, please contact Mike Hammer of my staff at (303) 312-6563.

Sincerely,

Cawl L. Campbell

Carol L. Campbell, Director Ecosystems Protection Program

cc: Elaine Suriano, OFA EPA-HQ

## SUPPLARY OF RATING DEFINITIONS AND FOLLOW-UP ACTIONS

## Environmental Impact of the Action

LO--Lack of Objections
The EPA review has not identified any potential environmental impacts
requiring substantive changes to the proposal. The review may have disclosed
opportunities for application of sitigation measures that could be
accomplished with no more than misor changes to the proposal.

EC-Environmental Concerns
The EPA review has identified environmental impacts that should be avoided in
order to fully protect the environment. Corrective measures may require
changes to the preferred alternative or application of mitigation measures
that can reduce the environmental impact. EPA would like to work with the
lead agency to reduce these impacts.

EG-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alterna tive or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory
The EPA review has identified adverse environmental impacts that are of
sufficient magnitude that they are unsatisfactory from the standpoint of
public health or welfare or environmental quality. EPA intends to work with
the lead agency to reduce these impacts. If the potential unsatisfactory
impacts are not corrected at the final EIS stage, this proposal will be
recommended for referral to the CEO.

## Adequacy of the Ispact Statement

Category 1—Adequate
EPA believes the draft EIS adequately sets forth the environmental impact(s)
of the preferred alternative and those of the alternatives reasonably avail
able to the project or action. No further analysis or data collection is
necessary, but the reviewer may suggest the addition of clarifying language or
information.

Category 2—insufficient Information
The draft EIS does not contain sufficient information for EPA to fully assess
environmental impacts that should be avoided in order to fully protect the
environment, or the EPA reviewer has identified new reasonably available
alternatives that are within the spectrum of alternatives analyzed in the
draft EIS, which could reduce the environmental impacts of the action. The
identified additional information, data, analyses, or discussion should be
included in the final EIS.

Category 3—inadequate

EPA does not believe that the draft EIS adequately assesses potentially
significant environmental impacts of the action, or the EPA reviewer has
identified new, reasonably available alternatives that are outside of the
spectrum of alternatives analyzed in the draft EIS, which should be analyzed
in order to reduce the potentially significant environmental impacts. EPA
believes that the identified additional information, data, analyses, or
discussions are of such a magnitude that they should have full public review
at a draft stage. EPA does not believe that the draft EIS is adequate for the
purposes of the NEPA and/or Section 309 review, and thus should be formally
revised and made available for public comment in a supplemental or revised
draft EIS. On the basis of the potential significant impacts involved, this
proposal could be a candidate for referral to the GEQ.

\*From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment.